



February 16, 2022

VIA ECF

Hon. Naomi R. Buchwald
Daniel Patrick Moynihan
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: *In re Aegean Marine Petroleum Network Inc. Sec. Litig.*, No. 18-CV-4993 (NRB)

To the Honorable Judge Buchwald:

Lead Plaintiff Utah Retirement Systems, on behalf of itself and each of the putative class members ("Lead Plaintiff"), and defendant Deloitte Certified Public Accountants, S.A. ("Deloitte Greece"), write jointly in connection with your honor's December 27, 2021 Order granting our application staying all proceedings and deadlines between said parties in the above-caption case through February 21, 2022 ("Stay"). This application was made because said parties reached a settlement to resolve the claims against Deloitte Greece and to allow Lead Plaintiff and Deloitte Greece to prepare and file a proposed settlement agreement and accompanying papers for preliminary approval of the partial settlement.

Lead Plaintiff and Deloitte Greece have been working diligently on negotiating the terms of the Settlement Agreement and accompanying exhibits. However, we are still negotiating the terms of the Stipulation of Settlement and its exhibits and working on the other papers. Moreover, as the Court is aware, Lead Plaintiff previously reached a settlement with PricewaterhouseCoopers Auditing Company S.A. ("PwC Greece"). Given the close proximity of the Deloitte Greece and PwC Greece settlements, Lead plaintiff, Deloitte Greece and PwC Greece believe it makes the most sense to move for both preliminary and final approval of both settlements at the same time. Accordingly, it will take some additional time to coordinate and finalize the proposed Class notice and other documents related to preliminary approval.

Accordingly, we jointly request an additional thirty-day extension on the Stay to Thursday, March 24, 2022, which will also serve as the deadline for Lead Plaintiff to file the motion and exhibits for preliminary approval.

Application
granted.
Naomi R. Buchwald,
USDS
2/17/22

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Respectfully submitted,

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